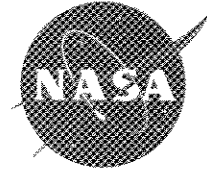


**National Aeronautics and Space Administration**

**Langley Research Center**

100 NASA Road  
Hampton, VA 23681-2199



February 6, 2012

Reply to Attn of: 30/Office of Chief Counsel

To: Distribution

From: Chief Counsel

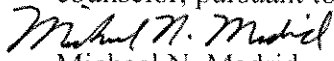
Subject: Blanket Determination Regarding Attendance at the Virginia AeroSpace Day Legislative Reception on Wednesday, February 8, 2012, from 6 to 8 P.M. at the Library of Virginia, Richmond, Virginia

The Virginia Aviation Business Association, Virginia Aviation Board, NASA Langley Research Center, Angel Flight, Lockheed Martin, and the National Institute of Aerospace are co-sponsoring a reception at on Wednesday, February 8, 2012, from 6:00 p.m. to 8:00 p.m. at the Library of Virginia in Richmond, Virginia. The reception is being held in conjunction with the annual Virginia AeroSpace Days at the Virginia General Assembly on February 8-9, 2012. The purpose of the event is to allow leaders in Virginia's aerospace community to discuss matters related to aerospace in Virginia, including NASA Langley's and NASA Wallops' significant roles in aerospace launch, research, and development work in Virginia. I have determined it to be in the best interest of the government for those invited NASA employees to attend this event in their official capacities and as representatives of NASA. The reception will be a gathering of approximately 400 people, including numerous federal, Commonwealth, and local government representatives, representatives of academia, and industry with a diversity of interests in aerospace launch, research, and development. In accordance with 5 C.F.R. §2635.204(g), and 14 C.F.R. §1207.103, I find that the event meets the definition of a "widely attended gathering." I further find that there is an agency interest in having NASA employees attend the event because they will have the opportunity to further Agency programs and operations through the exchange of views and information between local and State public officials, aerospace industry leaders, Virginia congressmen and women, and members of academia who have an interest in NASA's space and aeronautics mission in Virginia. The estimated value of the invitation, which includes food and beverages, is \$30.00 per person.

Accordingly, NASA employees whose duties do not substantially affect the reception sponsors (Virginia Aviation Business Association, Virginia Aviation Board, Angel Flight, Lockheed Martin, and the National Institute of Aerospace), or a majority or all of the various members, may accept an invitation and free food and beverages at the reception. They may also accept invitations for an accompanying spouse and guests.

NASA employees in non-career positions for which the Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the event sponsors the cost of the reception for themselves and accompanying guests.

Additionally, NASA employees whose duties may substantially affect the non-NASA sponsors, for instance by way of procurement responsibilities or through making decisions to partner with sponsors on projects should seek an individual determination from their ethics counselor, pursuant to 5 C.F.R. § 2635.205(g)(3)(i), regarding participation in this event.

  
Michael N. Madrid  
Deputy DAEO